UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION

This Document Applies to All Actions Filed Against Defendant Personal Care Products Council MDL No. 16-2738 (FLW) (LHG)

PERSONAL CARE PRODUCT COUNCIL'S MOTION TO JOIN AND ADOPT THE DAUBERT MOTIONS FILED BY DEFENDANT JOHNSON & JOHNSON

Pursuant to the Court's Amended Case Management Order No. 12 for Expert Witnesses and *Daubert* proceedings, Defendant Personal Care Products Council ("PCPC") submits this Motion to Join the *Daubert* Motions filed by Defendant Johnson & Johnson for Plaintiffs' designated expert witnesses. Respecting the Court's time with the volume of material and experts involved in this case, PCPC seeks to avoid duplication of the briefing of co-defendant Johnson & Johnson. The legal issues raised by Johnson & Johnson as to Plaintiffs' designated expert witnesses for general causation are equally apt to PCPC. Accordingly, PCPC joins Johnson & Johnson's arguments as set forth in its *Daubert* Motions filed with this Court on May 7, 2019. PCPC reserves the right to supplement Johnson & Johnson's briefing to the extent the Court renders any arguments presented as inapplicable to PCPC.

DATED: May 7, 2019 Respectfully submitted,

PERSONAL CARE PRODUCTS COUNCIL

By: <u>/s/ Thomas T. Locke</u>

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system and is available for viewing and downloading from the CM/ECF system. The forgoing document was served upon all counsel of record via the CM/ECF system on this 7th day of May, 2019.

SEYFARTH SHAW LLP Attorneys for Personal Care Products Council

/s/ Thomas T. Locke

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